

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**U.S. SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**Civil Action No. 2:21-cv-01226**

**v.**

**VUUZLE MEDIA CORP., *et al.*,**

**Defendants.**

**DECLARATION OF DREW ISLER GROSSMAN IN SUPPORT OF  
PLAINTIFF’S MOTION FOR ALTERNATIVE SERVICE**

I, Drew Isler Grossman, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am employed as counsel by the United States Securities and Exchange Commission (“Commission” or “SEC”) in the Division of Enforcement, at the SEC’s headquarters office in Washington, D.C. I am assigned to the Commission’s investigation relating to the conduct alleged in the Complaint and the Amended Complaint. I make this Declaration in support of the SEC’s Motion for Alternative Service and based upon my personal knowledge, my discussions with other Commission staff members, and information contained in the files of the Commission.

**Defendant Flynn Appears to Change Residences in Dubai at Least Annually**

2. As stated in my declaration of April 15, 2021 (ECF No. 30-1), at the time of the SEC's first motion for alternate service, the most current address information in our possession for Mr. Flynn was a lease for a corporate apartment at the World Trade Centre Residences, United Arab Emirates ("UAE") that expired on October 1, 2020. (*Id.* ¶ 2; ECF No. 9-11). This was based on a Tenancy Contract Information Registration Certificate dated October 1, 2019, which was obtained as an attachment to an email from Che Carson to mohmoustafa@etisalat.ae, copying Defendant Flynn. (ECF No. 30-1, ¶¶ 2-3; ECF No. 9-11; ECF No. 30-2).

3. On or about April 9, 2021, the SEC submitted a request for assistance to the Securities and Commodities Authority ("SCA") in the UAE under the International Organization of Securities Commissions Multilateral Memorandum of Understanding, to which both the SEC and the SCA are signatories. The request sought the SCA's assistance in obtaining information from the Government of Dubai Land Department concerning Defendant Flynn's current address. (ECF No. 30-1, ¶ 5).

4. The SEC received a response to its request for assistance approximately six months later, on or about October 18, 2021. The response attached two Excel spreadsheets concerning lease contracts registered in the name

of Ronald Shane Flynn, according to the database of the Dubai Lands and Properties Department. The spreadsheets were produced in Arabic, with unofficial translations provided by the UAE SCA. One spreadsheet concerned leases registered to Ronald Shane Flynn under an American passport, and the other concerned leases registered to Ronald Shane Flynn under a passport from the Commonwealth of Dominica. Copies of these spreadsheets, converted into PDF form, are attached as **Exhibit 1** and **Exhibit 2** hereto.

5. The spreadsheets reflect that, although Defendant Flynn may be living in Dubai, he does not maintain a permanent residence for longer than a year. For example, Exhibit 1 reflects a lease at the World Trade Center Residence, Second Commercial Center, Dubai, that ran from October 2, 2019 to October 1, 2020, which was cancelled early; and a lease at the Balqis Residence 3 in Palm Jumeirah, Dubai, that ran from June 20, 2020 to June 19, 2021. And Exhibit 2 reflects a one-year lease of Apartment 403 at the Sultana building in Palm Jumeirah, Dubai, running from June 24, 2021, through June 23, 2022.

6. The lease on the Sultana building apartment expires in approximately three months. And, based on the records produced to the SEC by the UAE SCA, Defendant Flynn has a pattern of changing apartments at the expiry of each lease, if not earlier. Thus, it is unclear if the Sultana address is Flynn's current physical address, or will remain so after the filing of this motion.

**Defendant Flynn Continues to Use His Gmail Address**

7. As noted in my declaration of February 16, 2021 (ECF No. 9-2), Defendant Flynn uses the email address “rflynn48@gmail.com” as his primary email address, has used this address consistently since at least September 6, 2016, and uses this address as his primary contact for a variety of personal and business purposes, including to open bank accounts in the UAE. (*Id.* ¶¶ 12-15).

8. Documents reflect that Defendant Flynn continues to actively use this email address. For example, on November 15, 2021, Flynn forwarded a marketing note titled “From The Desk of the Founder of Vuuzle Film Productions, Ronnie Flynn” from the email address rflynn48@gmail.com to a number of Vuuzle-affiliated persons, including Josh Flynn, John Lamb, Christopher Petit, Joseph Bonica, Che Carson, Joseph Salvador, Prophecy Onasis, and Ted Joseph. A true and correct copy of this email is attached as **Exhibit 3**.

9. In Vuuzle's February 28, 2022 response to the SEC's Request for Admission number 27, Vuuzle admitted that "the email address rflynn48@gmail.com is an e-mail address of Flynn."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 2022.



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Drew Isler Grossman